

Improving the MPAG Processing

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Topics

- **➤ MPAG Review Scheduling System**
- > MPAG Scheduling Process Workflow
- > Qualifying Requirements for MPAG Review Scheduling
- **Example 1: Separate FCC ID's**
- **Example 2: Separate FCC IDs w/ Data Referencing**
- > MPAG Review Timeline



MPAG Review Scheduling System (I)

- Previously outlined MPAG advanced scheduling process finally going live in May 2023
- The process is to allow applicants to ask for a scheduled response date for (complex enough) MPAG reviews
- No additional tools required: process entirely managed via KDB Inquiry tool
- Process already tested in a "stealth" mode
- Suitable for large filings, and months-ahead product developments
- Gained data will drive improvements and allow for effectiveness evaluation



MPAG Review Scheduling System (II)

- The general philosophy is to improve MPAG processing efficiency via better resource allocation thus leaving room also for conventional inquiries
- KDB Inquiry-based system to request FCC-scheduled response date on MPAG reviews
- Response is to provide feedback on MPAGs, not necessarily approval
- Response dates set by FCC, based on workload, and on a first-come, first-served basis
- Only MPAGs that meet specific criteria are eligible for this process (to avoid overload)



MPAG Review Scheduling System (III)

- Provisions for scheduling an additional feedback date (up to a limit) when review iterations are needed, e.g., when FCC requests additional information
- Real-life test of the overall functionality:
 - Start date upon publication of Addendum to KDB 388624 (May 2023)
 - Preliminary trial period planned for one year
 - May be discontinued/modified at any time (without affecting already submitted applications)

April 26, 2023 TCB Workshop

MPAG Scheduling Process Workflow

1) TCB requests scheduling of MPAG review date

 TCB sends a KDB inquiry requesting a review date with information on number of devices (number of FCC IDs), number of applicable PAG items, date of expected upload of applications

2) FCC schedules a review date

- Best effort is made to meet the scheduled date, but it is not binding
- Any FCC delay, albeit expected to be small (e.g., a few days), communicated a.s.a.p.
- Not an assurance for approvals: questions, requests, or denials are also possible

3) After the review

- Requests for additional information will come with a new scheduled review date for the additional feedback (factoring in the need for additional lab. time, if needed)
- At FCC discretion, repeated review iterations due to incorrect\insufficient information, may result in no further date scheduling, reverting to the standard process

Qualifying Requirements for MPAG Review Scheduling

- MPAG size threshold: MPAG will consist of at least *four* PAG items (to avoid "clogging" the system with a multitude of small MPAGs)
- Scheduled review date: requests shall be presented at least two calendar months away from the planned application upload date.
 - Example. A request for MPAG scheduling comes in on February 3rd, the upload of applications by the TCB is scheduled by April 3rd.
 - This process may lead TCBs to opt for the "standard" process in many cases, while making this approach more suitable for longer-term planned projects not yet ready
- Requests shall include an MPAG outline: *e.g.*, device features, list of PAG items, variants from reference models, etc.
- Requests will not be considered unless complete.
- Each MPAG may relate to more than one FCC ID, but only for identified variants of a reference model, and for the purpose of approved data referencing



- Manufacturer is planning for the certification of a new device that consists of two models ("A" and "B", w/different FCC IDs), to be fully tested separately
- TCB receives manufacturer's preliminary documentation, reviews it, and identifies required PAGs, to qualify for the MPAG Scheduling
- TCB reports that model "A" has *four* separate PAG items, while model "B" requires two PAGs.
- The two devices are tested independently, therefore require two separate MPAGs
- TCB informs the manufacturer that only model "A" qualifies for a request for MPAG review scheduling (based on minimum number of PAGs per MPAG)

Example 2: Separate FCC IDs w/ Data Referencing

- Manufacturer is planning for a new device certification that consists of two models, a reference and a variant, each with different FCC IDs, and with a KDB-accepted test data referencing plan
- A single MPAG can be filed for both the reference and variant
- TCB receives manufacturer's preliminary documentation, reviews it, and identifies required PAGs to qualify for the MPAG Scheduling
- TCB reports that model "A" has three separate PAG items, while model "B" requires only one PAG: the combined MPAG package with both models qualifies for MPAG Scheduling (based on the number of PAGs)
- TCB submits requests for MPAG review scheduling via KDB (there will be a new MPAG Scheduling Category) with the information about PAGs and FCC IDs



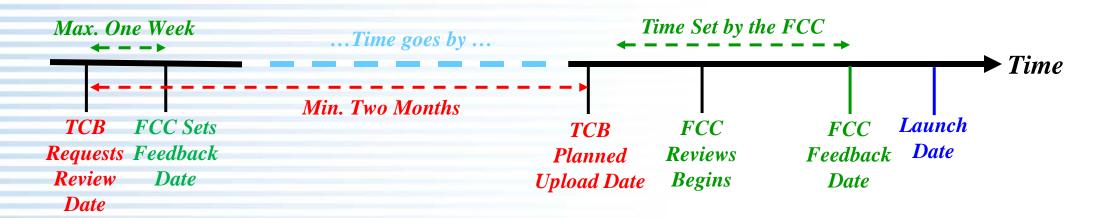
- TCB requests for MPAG review scheduling with KDB containing list of PAG items, device description(s), and planned application upload date
- FCC responds with estimated scheduled date for MPAG feedback
- Lab testing data are sent to the TCB
- TCB reviews lab tests for correctness and files full applications on or before the stated application upload date
- On the scheduled date for feedback, FCC responds with a request for clarification, along with a new scheduled feedback date (to account for time required to collect the information)
- After receiving clarifications, on the new scheduled date, FCC clears the PAGs for grant processing

MPAG Review Timeline (II)

- Notional timeline for the MPAG scheduled review process
- To be formalized in KDB 388624 annex document

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- PAG items and applicable variants (number of FCC IDs) named at the time of initial request of review date scheduling
- All exhibits need to be filed by the TCB-planned upload date





Conclusions

- Advance MPAG scheduling going live (May 2023)
- Not all MPAG qualify, regular process is not penalized
- Comments/suggestions welcome
- Trial period (one year) to gain additional feedback
- Possible process re-tuning based on performance and feedback